



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

February 14, 2012

By Federal Express

Adam D. Perlmutter, Esq.
260 Madison Avenue, Suite 1800
New York, NY 10016

Samuel M. Braverman, Esq.
901 Sheridan Avenue
Bronx, NY 10451

Susan Kellman, Esq.
25 8th Avenue
Brooklyn, NY 11217

Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's obligations under Brady v. Maryland, 373 U.S. 83 (1963) and Court's prior order of November 4, 2009,¹ the government hereby furnishes the following additional discovery in the above-captioned case.

Please note that Discovery Exhibits 1375 to 1377 contain Internal Affairs Bureau ("IAB") Source Materials, as defined in the government's January 30, 2012 discovery letter (ECF Docket No. 1340).

¹ See United States v. Gioeli, et al., No. 08 CR 240 (BMC), ECF Docket No. 442 (filed November 4, 2009).

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1375	CD containing Box 5 of the IAB Source Materials, organized into PDF files according to the original file folders and labeled "Folders 1-24"
1376	CD containing Box 6 of the IAB Source Materials, organized into PDF files according to the original file folders and labeled "Folders 1-56"
1377	CD containing Box 7 of the IAB Source Materials, organized into PDF files according to the original file folders and labeled "Folders 1-48"
1378	City of New York Office of the Chief Medical Examiner Laboratory Report of results of PCR (polymerase chain reaction) DNA testing on certain cigarette butts obtained from the scene of the Ralph Dols murder
1379	Photographs taken during search of Dino Saracino's vehicle on June 23, 2008

If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: All Counsel (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)